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5 Attorney for Defendant and Cross-Complainant
GERALD ARMSTRONG

FILED

AUG 17 1994

HOWARD HANSON
MARIN COUNTY CLERK
C HARDING DEPT

6
7 SUPERIOR COURT OF THE STATE OF CALIFORNIA

8 FOR THE COUNTY OF MARIN

RECEIVED

AUG 18 1994

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10 CHURCH OF SCIENTOLOGY INTERNATIONAL,) No. 157 680 HUB LAW OFFICES
11 a California not-for-profit)
religious corporation,)
12)
Plaintiff,)
13)
vs.)
14)
GERALD ARMSTRONG; MICHAEL WALTON;)
15 THE GERALD ARMSTRONG CORPORATION,)
a California for-profit)
16 corporation; DOES 1 through 100,)
inclusive,)
17)
Defendants.)
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28)

NOTICE OF MOTION AND
MOTION TO COMPEL FURTHER
RESPONSES TO REQUESTS FOR
ADMISSION AND FOR
SANCTIONS; POINTS AND
AUTHORITIES; DECLARATION
OF FORD GREENE; SEPARATE
STATEMENT OF REQUESTS AND
RESPONSES IN DISPUTE

Date: 9/2/94
Time: 10:00 a.m.
Dept: Referee Benz
Trial Date: 9/29/94

TO PLAINTIFF AND CROSS-DEFENDANT CHURCH OF SCIENTOLOGY
INTERNATIONAL AND TO ITS ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that on September 2, 1994, at 10:00 a.m.,
or as soon thereafter as the matter may be heard by the discovery
referee, William R. Benz located at 900 Larkspur Landing Circle,
No. 185, Larkspur, California, Defendant and Cross-Complainant
Gerald Armstrong will seek an Order requiring Scientology to
further respond to the Requests for Admission that are set forth
more fully in the Statement of Requests and Disputed Responses.
In addition Armstrong seeks an order which awards monetary

1 sanctions against plaintiff and its attorneys, the law firms of
2 Bowles and Moxon, and Wilson, Ryan and Campolongo and against
3 Laurie J. Bartilson and Andrew Wilson.

4 This motion is brought pursuant to Code of Civil procedure
5 sections 2023 and 2033 and is factually predicated on plaintiff's
6 failure to properly respond to certain Requests for Admission
7 propounded by Armstrong.

8 This motion is based upon the instant Notice, the
9 accompanying Memorandum of Points and Authorities, Statement of
10 Requests and Responses in Dispute, the Declaration of Ford Greene,
11 and all the Court's files and records in this case.

12 DATED: August 17, 1994 HUB LAW OFFICES

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16 By: FORD GREENE
17 Attorney for Defendant and
18 Cross-Complainant
19 GERALD ARMSTRONG
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PROOF OF SERVICE

I am employed in the County of Marin, State of California. I am over the age of eighteen years and am not a party to the above entitled action. My business address is 711 Sir Francis Drake Boulevard, San Anselmo, California. I served the following

documents: NOTICE OF MOTION AND MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR SANCTIONS; SEPARATE STATEMENT OF REQUESTS FOR ADMISSION AND RESPONSES IN DISPUTE; DECLARATION OF FORD GREENE IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION AND FOR MONETARY SANCTIONS; MEMORANDUM OF POINTS AND AUTHORITIES IN SUPPORT OF MOTION TO COMPEL FURTHER RESPONSES TO REQUESTS FOR ADMISSION FROM PLAINTIFF

on the following person(s) on the date ~~set~~ ^{8/18/94} forth below, by placing a true copy thereof enclosed in a sealed envelope with postage thereon fully prepaid to be placed in the United States Mail at San Anselmo, California:

MICHAEL WALTON, ESQ.
P.O. Box 751
San Anselmo, CA 94979

Andrew Wilson, Esquire
WILSON, RYAN & CAMPILONGO
235 Montgomery Street, Suite 450
San Francisco, California 94104

LAURIE J. BARTILSON, ESQ.
Bowles & Moxon
6255 Sunset Boulevard, Suite 2000
Los Angeles, California 90028

- (Personal Service) I caused such envelope to be delivered by hand to the offices of the addressee.
- (State) I declare under penalty of perjury under the laws of the State of California that the above is true and correct.

DATED: August 17, 1994